

# **Exhibit**

## **“A”**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
CASE NO. 2:23-cv-00332-KSM

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FRATERNAL ORDER OF POLICE :  
PENNSYLVANIA LODGE, SPRINGFIELD :  
TOWNSHIP POLICE BENEVOLENT :  
ASSOCIATION, CHRISTIAN WILBUR, :  
ROBERT BAIADA, and CHRIS :  
CALHOUN, : DEPOSITION UNDER  
Plaintiffs, :  
- vs - : ORAL EXAMINATION  
:  
TOWNSHIP OF SPRINGFIELD, JAMES : OF  
LEE, in his official capacity, :  
BAIRD M. STANDISH, in his : CHRISTIAN WILBUR  
official capacity, MICHAEL E. :  
MAXWELL, in his official :  
capacity, SUSANNA O. RATSAVONG, :  
in her official capacity, PETER :  
D. WILSON, in his official :  
capacity, JONATHAN C. COBB, in :  
his official capacity, EDDIE T. :  
GRAHAM, in his official :  
capacity, and A. MICHAEL TAYLOR :  
in his official capacity, :  
:  
Defendants. :  
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TRANSCRIPT OF DEPOSITION, taken by and  
before JAMES HOPPER, a Registered Professional  
Reporter and Notary Public, via Zoom Video  
Communications, on Wednesday, May 31, 2023,  
commencing at 9:57 a.m.

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ERSA COURT REPORTERS  
30 South 17th Street  
United Plaza - Suite 1520  
Philadelphia, Pennsylvania 19103  
(215) 564-1233

CHRISTIAN WILBUR

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2 APPEARANCES:

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4 ZIMOLONG, LLC

5 BY: JAMES J. FITZPATRICK, III, ESQUIRE

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7 Villanova, Pennsylvania 19085

8 Counsel for the Plaintiffs

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12 BY: RUFUS A. JENNINGS, ESQUIRE

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14 Suite 3400

15 Philadelphia, Pennsylvania 19103

16 Counsel for the Defendants

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CHRISTIAN WILBUR

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1 Q. At where?

2 A. Jenkintown.

3 Q. Jenkintown, okay.

4 Mr. Wilbur, did you review anything in  
5 preparation for your deposition today?

6 A. Just the Interrogatories and Calhoun's  
7 deposition.

8 Q. You read the entirety of Chris Calhoun's  
9 deposition transcript?

10 A. Yes.

11 Q. Did you do anything else to prepare for  
12 your deposition today?

13 A. No.

14 Q. Do you have any documents in front of you  
15 today?

16 A. I do not.

17 Q. Who is currently in the conference room  
18 with you?

19 A. Just myself and James.

20 Q. And that's James Fitzpatrick?

21 A. Yes.

22 Q. Okay. Mr. Wilbur, what is your full name?

23 A. Christian Donald Wilbur.

24 Q. What is your date of birth?

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CALHOUN,	:	DEPOSITION UNDER
Plaintiffs,	:	
- vs -	:	ORAL EXAMINATION
	:	
TOWNSHIP OF SPRINGFIELD, JAMES	:	OF
LEE, in his official capacity,	:	
BAIRD M. STANDISH, in his	:	CHRISTIAN WILBUR
official capacity, MICHAEL E.	:	
MAXWELL, in his official	:	
capacity, SUSANNA O. RATSAVONG,	:	
in her official capacity, PETER	:	
D. WILSON, in his official	:	
capacity, JONATHAN C. COBB, in	:	
his official capacity, EDDIE T.	:	
GRAHAM, in his official	:	
capacity, and A. MICHAEL TAYLOR	:	
in his official capacity,	:	
	:	
Defendants.	:	

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TRANSCRIPT OF DEPOSITION, taken by and  
before JAMES HOPPER, a Registered Professional  
Reporter and Notary Public, via Zoom Video  
Communications, on Wednesday, May 31, 2023,  
commencing at 11:52 a.m.

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Philadelphia, Pennsylvania 19103  
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CHRISTIAN WILBUR

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CHRISTIAN WILBUR

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1 Q. And that was unsolicited, correct?

2 A. Correct.

3 Q. Was a vote ever taken on whether or not to  
4 adopt any of those logos?

5 A. I don't believe so.

6 Q. Does the PBA have any agreement with its  
7 current attorneys regarding the payment of  
8 attorneys' fees in this case?

9 A. No.

10 Q. Has the PBA received any bills for  
11 services rendered by attorneys in this case?

12 A. No.

13 Q. Do you personally have any agreement with  
14 any attorney regarding payment of legal fees in this  
15 case?

16 A. No.

17 Q. Chris Calhoun testified that he was  
18 introduced to your attorney, current attorneys, by  
19 you. How did you become aware of Mr. Zimolong and  
20 Mr. Fitzpatrick?

21 A. Mr. Fitzpatrick reached out by phone.

22 Q. And that was an unsolicited conversation,  
23 unsolicited communication?

24 A. Yes.